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STATE OF HAWAII

LODGED

NOV 16 2011

8:45 AM

CLERK, U.S. DISTRICT COURT
DISTRICT OF HAWAII

FILED IN THE
UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII

NOV 18 2011

at 9 o'clock and 35 min. A.M.
SUE BEITIA, CLERK

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

JANE DOE, Individually and as
Next Friend of JOHN DOE, a
minor; et al.,

Plaintiffs,

vs.

STATE OF HAWAII; SCOTT O'NEAL;
SYDNEY DICKERSON; JOHN DOES,
1-10,

Defendants.

CIVIL NO. 11-00550 DAE/KSC

STIPULATION TO APPOINT A
MASTER; ORDER

STIPULATION TO APPOINT A MASTER

It is hereby stipulated and agreed by the parties that Riki
May Amano shall serve as the Master in this action. The parties
agree that the Master shall have the authority to manage and

facilitate; 1) the informal exchange of information concerning liability and damages, 2) discovery, and 3) settlement among the parties and persons not named as parties, but who claim injuries and/or damages as a result of the alleged conduct, acts and/or omissions alleged in this action.

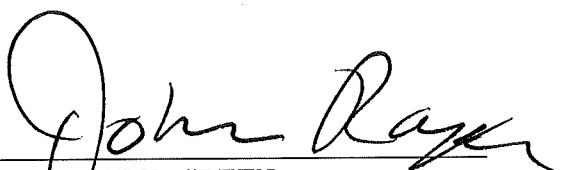
The duties of the Master shall include facilitating the examination, assessment and evaluation of those persons who claim to be injured and/or to have sustained damages, as a result of the conduct, acts and/or omissions alleged in the Complaint.

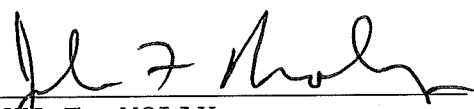
The parties shall agree on those persons who shall conduct those examinations, assessments and evaluations. In the event the parties are unable to agree on the person(s) who shall conduct those evaluations and assessments, the Master shall have the authority to determine whether such assessments and/or evaluations shall take place, who shall conduct those examinations, assessments and/or evaluations, and who shall be responsible for payment of reasonable fees and costs necessarily incurred incident to those examinations, evaluations and assessments subject to the further orders of the Court.

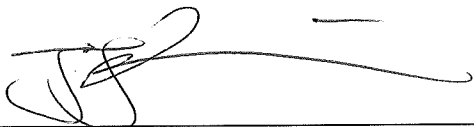
Although defendants admit no legal responsibility for the claims alleged in the Complaint or otherwise, it is the intent of the parties by the execution of this stipulation appointing a Master that the legitimate claims of those persons who have been

injured and/or damaged by the acts and/or omissions alleged in the Complaint, be resolved with the minimum of litigation and its consequent expense. This intent to resolve the claims of the student-Plaintiffs includes the provision of professional mental health services deemed necessary by an agreed upon mental health professional for mental/emotional injuries resulting from acts and/or omissions that could create liability on the part of another party. Nothing in this stipulation shall be construed to limit the parties' rights to have the Plaintiffs-students examined pursuant to Federal Rules of Civil Procedure Rule 35.

DATED: Honolulu, Hawaii NOV 15 2011


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JOHN U. RAPP
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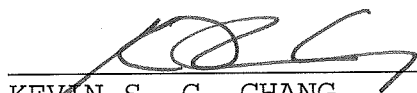


C. BRYAN FITZGERALD
Attorney for Defendant
SYDNEY DICKERSON



ERIC A. SEITZ
Attorney for Defendant
ROXSANNE TOMITA

APPROVED AND SO ORDERED:



KEVIN S. C. CHANG
JUDGE OF THE ABOVE ENTITLED COURT

NOV 17 2011